

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

PRIORITIES USA, RISE, INC.,  
DETROIT/DOWNRIVER CHAPTER No. 19-13341  
OF THE A. PHILIP RANDOLPH  
INSTITUTE,

Plaintiffs,

v

DANA NESSEL, in her official  
capacity as the ATTORNEY  
GENERAL OF THE STATE OF  
MICHIGAN,

Defendant.

HON. STEPHANIE DAWKINS  
DAVIS

MAG. KIMBERLY G. ALTMAN

**DEFENDANT ATTORNEY  
GENERAL DANA NESSEL'S  
WITNESS LIST**

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**DEFENDANT ATTORNEY GENERAL DANA NESSEL'S  
WITNESS LIST**

Defendant Michigan Attorney General Dana Nessel, by her  
attorneys, Heather S. Meingast and Erik A. Grill, Assistant Attorneys  
General, submit the following as their Witness List:

1. Plaintiff Priorities USA ("Priorities") (c/o counsel for Priorities USA)
2. Plaintiff Rise, Inc. ("Rise") (c/o counsel for Rise, Inc.)
3. Plaintiff Detroit/Downriver Chapter of the A. Philip Randolph Institute ("the Institute")
4. Lori Bourbonais, Bureau of Elections, Michigan Department of State
5. Any expert witness deemed necessary during discovery (to be identified later).
6. All witnesses identified or named by other parties.
7. All witnesses necessary to identify or authenticate documents.
8. All persons deposed before trial.

9. All persons identified in any party's discovery responses, or in any document produced through discovery.
10. All necessary rebuttal witnesses.
11. Any document custodians necessary to lay foundation for introduction of any exhibit.
12. Defendant Attorney General Dana Nessel may seek to amend this list up to the time of trial to add any other witnesses who become known through further discovery.

Respectfully submitted,

s/Erik A. Grill

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Dated: October 4, 2021

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2021, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

s/Erik A. Grill

Erik A. Grill (P64713)

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